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March 31, 2020

By ECF

Honorable Colleen McMahon – Chief Judge
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Alex Nunez*
19 Cr. 691 (CM)

Dear Chief Judge McMahon:

I write to respectfully request an adjournment of the deadline for filing pretrial motions on behalf of my client, Alex Nunez, for 45 days due to the recent COVID-19 pandemic.

Our pretrial motions are currently due on Friday, April 3, 2020. As a result of the combination of the lockdown of Brooklyn MDC and the current COVID-19 quarantine, we have not had the opportunity for a face to face conference with Mr. Nunez to discuss contemplated motions. Additionally, various measures taken by the Bureau of Prisons have deprived our client of meaningful access to discovery materials.

Restrictions upon travel and access to our offices has made the preparation of motions logistically extremely difficult. I am currently self-confined to the "containment zone" in New Rochelle, New York, and my office is working remotely.

I therefore respectfully request that the deadline for pretrial motions on behalf of Mr. Nunez be extended 45 days.

AUSA Christopher Clore consents to this request.

JR/Nunez/Adj Ltr

MEMO ENDORSED

4/1/20

granted

Colleen McMahon

4/1/20

STAMPUR & ROTH

Very truly yours,

A handwritten signature in black ink, appearing to be 'JR' or 'James Roth', written over a horizontal line.

James Roth, Esq.

cc: AUSA Christopher Clore